

Montana Public Service Commission



Brad Johnson, Chairman
Bob Lake, Vice Chairman
Roger Koopman, Commissioner
Tony O'Donnell, Commissioner
Randall Pinocci, Commissioner

September 6, 2019

The Honorable Neil Chatterjee
Chairman
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Dear Mr. Chairman:

I am writing to request that FERC make a decision and issue an order in an expeditious manner for the docket titled *Grid Reliability and Resilience Pricing and Grid Resilience in Regional Transmission Organizations and Independent System Operators* ("ISO/RTO Grid Reliability and Resilience Docket") that FERC opened almost 19 months ago.ⁱ

FERC opened this docket to examine reliability and resilience on January 8, 2018, noting that it "must remain vigilant with respect to resilience challenges, because affordable and reliable electricity is vital to the country's economic and national security". As part of the proceeding, FERC directed ISO/RTOs to respond to a series of questions regarding resilience. On March 8, 2018, FERC issued an order granting further time to consider responses to those questions, as well as other stakeholder comments.ⁱⁱ

In the meantime, substantial baseload retirements, especially coal-fired units, and the evolution of the electric power sector, are bringing increased attention to grid resilience and fuel security. Nationwide, 40 percent (126,000 megawatts (MW)) of the nation's coal fleet has retired or announced plans to retire.ⁱⁱⁱ By the end of 2020, some 67,000 MW of coal-fired generating capacity in ISO/RTO footprints will have retired.^{iv} This total includes more than 10,000 MW that have announced intentions to retire this year and in 2020.^v The four ISO/RTO regions with the most coal retirements through 2020 are PJM (36,200 MW), MISO (14,800 MW), ERCOT (5,800 MW) and SPP (5,000 MW).^{vi}

In addition, 20 percent of nuclear units (21 of 105) have retired or announced plans to retire by 2030, amounting to over 17,000 MW of capacity.^{vii}

While we appreciate the Commission's efforts to examine challenges related to the reliability and resilience of the bulk power system, we are not aware of any further action, other than soliciting comments, the Commission has taken with respect to the 19-month old ISO/RTO Reliability and Resilience Docket.

Request

I request that FERC makes a decision on the docket and issue an order in a timely manner.

If you have any questions, please contact Drew Zinecker, Communications Director at the Montana Department of Public Service Regulation.

Sincerely,



Brad Johnson, Chairman
Montana Department of Public Service Regulation

CC: Commissioner Richard Glick
 Commissioner Bernard L. McNamee

ⁱ *Order Terminating Rulemaking Proceeding, Initiating New Proceeding, and Establishing Additional Procedures, Grid Resilience in Regional Transmission Organizations and Independent System Operators*, 162 FERC ¶ 61,012 (2018).

ⁱⁱ *Order Granting Rehearing for Further Consideration*, Docket No. RM18-1-001 and AD18-7-001 (2018).

ⁱⁱⁱ America's Power, *Retirements of Coal-Fired Electric Generating Units as of June 30, 2019*, www.AmericasPower.org.

^{iv} *Ibid.*

^v *Ibid.*

^{vi} *Ibid.*

^{vii} S&P Global Market Intelligence generating unit database, queried July 29, 2019.